

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Creosote DeRidder - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #1
Initial - Removal Action
American Creosote DeRidder
A6KM
DeRidder, LA
Latitude: 30.8317038 Longitude: -93.2768610

To: Jeff Dausat, LDEQ
Reggie Cheatham, EPA HQ
Craig Carroll, EPA Region 6

From: Adam Adams, OSC

Date: 3/27/2020

Reporting Period: March 3 to 27, 2020

1. Introduction

1.1 Background

Site Number:	A6KM	Contract Number:	
D.O. Number:		Action Memo Date:	12/18/2019
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	3/3/2020	Start Date:	3/4/2020
Demob Date:		Completion Date:	
CERCLIS ID:	LAN000604293	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA incident category: Inactive Production Facility – Creosote Wood Treater
This is an EPA lead Time-Critical Removal Action.

1.1.2 Site Description

American Creosote Deridder (Site) consists of a 55-acre tract of land owned by Central Manufacturing Co. (CMC) and the location of an inactive facility that produced creosote-treated wood. The Site has been inactive for 60+ years and currently covered by a mixture of heavy timber and extensive overgrowth.

The Shreveport Creosoting Company operated the facility from early 1920's until approximately 1957, used creosote oil and oil tar in their treatment process, and abandoned the facility after 25+ years of operations. The abandoned facility is located in the central west portion of the Site and contains remnants of the former facility along with process related waste. Site drainage from the abandoned facility primarily flows overland southwest, along western property boundary, into an unnamed drainage ditch/stream, which is a segment of contiguous wetland, then flows west through a culvert and under an old Burlington Northern Santa Fe (BNSF) Railway spur where it continues to flow southwest into a fresh water pond.

1.1.2.1 Location

The Site is located off of Post Plant Road, south of the corporate limits of the City of DeRidder, Beauregard Parish, LA; at 30.831693°, -93.276863°; in Section 3, Township 3 South, and Range 9 West; and within a mixed use area, residential and industrial. The Site is bounded in the north by a rural roadway, in the east by heavy brush, in the south by undeveloped land, and in the west by the old BNSF spur. The Site is accessible from the north at the intersection of Post Plant Rd. and the old BNSF spur and from the south at the intersection of Crosby Rd. and the old BNSF spur. An estimated 1,491 people live within a 1-mile radius of the Site, and the nearest residence is located approximately 0.3 miles to the east then residential communities approximately 0.5 miles to the east and north.

1.1.2.2 Description of Threat

The Site was finalized on the NPL on January 2018, and scored based on 5 Source Areas (SAs) and an observed release of hazardous substances to the surface water pathway. EPA identified numerous hazardous substances, primarily PAHs, within and around the 5 SAs, drainage pathway, and groundwater;

TPH and metals were also identified. The 5 SAs include: 1) Concrete Structure of a Former Retort House, 2) Concrete Oil/Water Separator, 3) Unlined Wastewater Pit (AKA pond), 4) Aggregated Areas of Contaminated Soil, and 5) Stockpile of Creosote Solids.

In August 2018, EPA Remedial began a Remedial Investigation/Feasibility Study (RI/FS). In 2019, EPA Remedial Program requested assistance from the EPA Removal Program to address source material at the Site to prevent further offsite migration and reduce the threat to public health and environment while long-term remedial actions were determined. EPA Remedial identified 3 SAs (SAs 1, 2, and 3) as the primary concern that contain creosote solids and impacted soil, sediment, and/or surface/storm water containing PAHs and/or metal concentrations above RMLs. The highest concentrations were 4,314 ppm of benzo(a)pyrene (BAP) Equivalent and 25.3 ppm of thallium within SA 3 sediment as compared to the industrial setting RMLs of 210 ppm and 12 ppm, respectively.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In November 2019, EPA and the EPA Superfund Technical Assistance Response Team (START) contractor conducted a preliminary removal assessment. The Site was found to contain approximately 2,254 cubic yards of solid waste and approximately 204,974 gallons of liquid waste within and around SAs 1, 2, and 3, as applicable; identified BAP and naphthalene as main safety concerns; determined dioxins/furans were not present; selected approximate location of the 2,400-foot access pathway to SAs; and estimated 3 acres of vegetation clearing for pathway and work zones (estimates only).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The Removal Action began on March 4, 2020 and continued until March 27, 2020 when removal activities were temporarily suspended as part of the COVID-19 pandemic. During this time, operations primarily consisted of site set-up (establishment of work zones and an access pathway to the SAs). EPA also conducted some pre-removal backfill source and waste characterization sampling, ambient air monitoring, and removal and consolidation of SA 1 waste. During SA 1 waste removal and consolidation, a small amount (less than 160 square feet) of suspected ACM (transite shingle like) was discovered within SA 1; the material was sampled, analyzed by PLM, and determined to contain 20% chrysotile. The ACM was segregated from other waste and secured with poly sheeting.

Prior to mobilization and throughout the first month of the operation, EPA OSCs notified local and state governments, local community, and property owners of EPA's actions. EPA OSCs also coordinated response efforts with the RPM to ensure removal actions contribute, to the extent practicable, to the efficient performance of the long-term remedial action. EPA met with the DeRidder City Council on March 9, and then a few times that week with the Fire Chief, Police Chief, and other representatives of the city of DeRidder to explain the Removal Action and answer questions.

In addition, EPA OSCs evaluated on-site waste and determined, in consultation with EPA RCRA counterparts and concurrence with the RPM: 1) SAs 1, 2, and 5 contained listed hazardous wastes (F034 and K001) in the form of liquid, soil/sediment/solid, and/or sludge based on knowledge of past on-site operations; 2) SA 3 does not contain listed hazardous waste due to the lack of knowledge of when and how the wastes were generated, and SA 4 does not contain a listed hazardous waste as the waste was created after operations ceased from overflows in SA 3; and 3) liquid waste within SA 1 pit and SA 3 contain low levels of COCs and can be used on-site for respective SA waste dust suppression.

On March 27, 2020, all equipment, except for the office trailer, and removal personnel demobilized from the Site for a temporary stand-down due to the pandemic consistent with CDC and national guidance. Prior to demobilization, equipment was decontaminated; waste piles were secured with poly sheeting and sand bags; erosion control was applied to the scraped area between SA 1 and SA 3; the exclusion zone, encompassing SA 1, 2, and 3, was marked with orange poly mesh; Site signage with contact information were installed at both Site entrances and around the exclusion zone. No trespassing signs were installed along access pathways; and EPA informed state and local government of Site status.

2.1.2 Response Actions to Date

Following assessment of Site conditions at the Site by the EPA Removal Program, an Action Memorandum for the Removal Action was approved and signed on December 18, 2019.

On March 3, 2020, EPA along with START and ERRS mobilized to implement the removal action.

On March 9, 2020, OSC Adams attended a community meeting with Deridder City Council to inform them of on-going and planned Removal Action operations. Following the meeting, Deridder law enforcement, emergency, public works, and other local government officials conducted several Site visits for a briefing and opportunity for questions and answers.

On March 19, 2020, EPA collected a representative sample of SA 3 sediment for waste characterization.

During week ending March 21, 2020, EPA began consolidation of SA 1 waste within SA 1 in preparation for transportation and disposal off-site.

On March 24, 2020, EPA completed establishing an access/egress pathway to the exclusion zone; approximately 1,800 feet long with geo-fabric, approximately 2,000 tons of rock, and approximately 900 tons of road base/fines to complete.

On March 27, 2020, the removal action was temporarily suspended in response to guidance and concerns related to the COVID-19 pandemic. Removal personnel and equipment, except for the office trailer, were demobilized from the Site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Potentially Responsible Party (PRP) is Central Manufacturing Company (CMC).

2.1.4 Progress Metrics

No wastes have been transported for disposal, as of the date of this POLREP.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Removal of wastes from the SAs and vicinity will be conducted by EPA. EPA will transport and dispose of the wastes off-site at acceptable disposal facilities. EPA will continue to coordinate the Removal Action with state and local governments, and communicate the status of the operations with the EPA RPM, property owner, and the community.

2.2.1.1 Planned Response Activities

- EPA is prepared to mobilize back to the Site and resume the removal action following lifting of the temporary stand-down due to pandemic conditions.

2.2.1.2 Next Steps

- Evaluate waste disposal options for SA 3 sediment and liquids as necessary.
- Coordinate return with EPA contractors, state and local government, and continue communications with the EPA RPM, property owner, and community.

2.2.2 Issues

Consistent with CDC and national guidance regarding the COVID-19 pandemic, EPA temporarily stood down this Removal Action until further notice. This temporary stand down may result in additional costs and time to complete the removal action. Prior to demobilization, signage was installed to indicate hazardous conditions on-site, and that authorized personnel only were permitted on-site. EPA Remedial was working on perimeter fencing to secure the Site.

Discovery of ACM in one of the source areas resulted in an additional and unplanned waste stream.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No financials are provided in this POLREP, at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

EPA is coordinating this removal action with the EPA Remedial Program, LDEQ, Louisiana Department of Health and Hospital (LDHH), and City of DeRidder.

4. Personnel On Site

EPA OSC - 1 (2 at times, as needed)

EPA ERRS Contractors – 7 (8 at times, as needed)

EPA START Contractors – 1 (2 at times, as needed)

EPA Remedial Team personnel on-site are not included in this POLREP and are on-site at the discretion of the EPA RPM.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information may be obtained at response.epa.gov/AC-DeRidder.

6.2 Reporting Schedule

This is the Initial POLREP for this Removal Action. Additional POLREPs may be provided at the following frequency:

Progress POLREP - As progress continues over an extended period of time, a Progress POLREP may be submitted.

Special POLREP - In the event a significant situation occurs during the response, a Special POLREP may be submitted.

Final POLREP - Upon completion of this response, a Final POLREP shall be submitted.

POLREPs for Removal Assessment efforts will be submitted separately from the Removal Action POLREPs.

7. Situational Reference Materials

No information available at this time.